1 2		Judge: Hon. Thomas W. Dore Chapter 13 Location: Seattle Hearing Date: June 1, 2022	
3		Hearing Time: 9:30a.m. Response Date: May 25, 2022	
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6			
7	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
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9			
10	In Re:		
11	BEVERLY JANE CARY	Chapter 13	
12	Debtor	Bankruptcy Case No. 20-12450 TWD	
13		Adversary Case No. 22-01000-TWD	
	BEVERLY JANE CARY,		
14	Plaintiff,		
15	V.	DEFENDANT'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF	
16	PATCH SERVICES, LLC d/b/a NOAH; PATCH HOMES, INC.; FIRST AMERICAN	MOTION TO DISMISS PURSUANT TO FRBP 7041	
17	TITLE INSURANCE COMPANY LENDERS ADVANTAGE,		
18 19	Defendants.		
20	I. RELIEF REQUESTED		
21	Pursuant to Rule 201(b)(2) of the Fo	ederal Rules of Evidence, Defendant First	
22	American Title Insurance Company Lenders Advantage ("FATIC") requests judicial notic		
23	of the following documents submitted in supp	ort of FATIC's motion to dismiss Plaintiff's	
24 25	Second Amended Complaint ("Complaint"):		
	100047/002553/02633538-1 REQUEST FOR JUDICIAL NOTICE -1	LAGERLOF LLP 701 PIKE STREET, SUITE 1560	
Ca	Case No. 22-01000-TWD se 22-01000-TWD Doc 16 Filed 05/02/2	SEATTLE, WA 98101 2 Ent. 05/02/12/28 1276 372 400 Pg. 1 of 4	

1. Patch Services, LLC's exhibits in support of its Creditor's Claim filed in Plaintiff's Chapter 13 Bankruptcy in the United States Bankruptcy Court for the Western District of Washington at Seattle under Case No. 20-12450-TWD; a true and correct copy is attached as **Exhibit 1**.

II. AUTHORITY AND ANALYSIS

Grounds for judicial notice of Exhibit 1 are that it is a true and correct copy of exhibits to Patch Services, LLC ("Patch")'s Creditor's Claim filed in Plaintiff's Chapter 13 Bankruptcy Case under case no. 20-12450-TWD. This exhibit is part of the Court's record in the non-adversarial matter entitled *In re Beverly Jane Cary*, Western District of Washington Bankruptcy Court, Case No. 20-12450-TWD. See Dkt. 11 at 11-1. Furthermore ("Here, the trustee argues that the debtor's failure to disclose certain information in his statement of affairs and schedules constitutes a false oath under § 727(a)(4)(A) and the trustee asks the court to take judicial notice of the debtor's bankruptcy petition, schedules, statement of financial affairs, and related documents. 'Under Fed. R. Evid. 201(b)(2), which is applicable in bankruptcy cases, *see* Bankruptcy Rule 9017, a court may take judicial notice of facts that are not subject to reasonable dispute in that they are 'capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.' Accordingly, this court will take judicial notice of the contents of debtor's petition, schedules, statement of affairs, and related documents." *Clark v. Reed (In re Reed)*, 293 B.R. 65, 69 (Bankr. D. Kan. 2003)).

These documents are subject to judicial notice because the accuracy of the source from which these facts are derived cannot reasonably be questioned. Fed. R. Evid. 201(b)(2).

Accordingly, the Court is entitled to take judicial notice of the attached documents.

100047/002553/02633538-1 REQUEST FOR JUDICIAL NOTICE -2

LAGERLOF LLP

SEATTLE, WA 98101

Case No. 22-01000-TWD

Case 22-01000-TWD Doc 16 Filed 05/02/22 Ent. 05/02/128E1296392:400 Pg. 2 of 4

	DATED 1: and 1	CM 2022	
1	DATED this 2 nd day	of May 2022.	
2			
3		L	AGERLOF LLP
4			Robert A. Bailey
5			obert A. Bailey, WSBA No. 28472 01 Pike Street, Ste 1560
6		S	eattle, WA 98101 hone: 206-492-2300
7		E	mail: rbailey@lagerlof.com
8			ttorneys for First American Title ssurance Company
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	100047/002553/02633538-1 REQUEST FOR JUDICIAL NOT	ΓICE -3	LAGERLOF LLP 701 PIKE STREET, SUITE 1560
Ca	Case No. 22-01000-TWD se 22-01000-TWD Doc 1	.6 Filed 05/02/22	SEATTLE, WA 98101 Ent. 05/02/128E1276392:400 Pg. 3 of 4

DECLARATION OF SERVICE

- 1			
2	I hereby declare under penalty of perjury of the laws of the State of Washington		
3	and the United States of America that on this 2 nd day of May 2022, I electronically field		
4	the foregoing with the Clerk of the Court for the United States District Court, Western		
5	District of Washington using the CM/ECF system, which will provide notice to the		
6	following parties:		
7	Melissa A. Huelsman, WSBA No. 30935 Law Offices of Melissa A. Huelsman, P.S.	[] By United States Mail [] By Legal Messenger	
8	705 2 nd Ave, Suite 606	[] By Email:	
9	Seattle, WA 98104 Attorney for Plaintiff	mhuelsman@predatorylendinglaw.com [X] By CM/ECF E-Service	
10	Mark McClure, WSBA No. 24393	[] By United States Mail	
11	Law Offices of Mark McClure, PS 1103 W. Meeker St., Suite 101	By Legal Messenger By Email: mark@mcclurelawgroup.com	
12	Kent, WA 98032 Attorney for Plaintiff	[X] By CM/ECF E-Service	
13			
14	Christina L. Henry, WSBA No. 31273 Henry & Degraaff, PS	[] By United States Mail[] By Legal Messenger	
15	119 1 st Ave S., Suite 500 Seattle, WA 98104	[] By Email: chenry@hdm-legal.com [X] By CM/ECF E-Service	
16	Attorney for Plaintiff		
17	Faye Rasch, WSBA No. 50491	[] By United States Mail	
18	Law Office of Faye C. Rasch 600 Stewart St., Suite 1300	By Legal Messenger By Email: fraschlaw@gmail.com	
	Seattle, WA 98101	[X] By CM/ECF E-Service	
19	Attorney for Defendant Patch Services LLC		
20	DATED this 2 nd day of May 2022 at Seattle, Washington.		
21			
22	s/ Karrie L. Blevins		
23	Karrie L. Blevins, Paralegal Lagerlof LLP		
24			
25			
	100047/002553/02633538-1 REQUEST FOR JUDICIAL NOTICE -4 LAGERLOF LLP		
	Case No. 22-01000-TWD	701 PIKE STREET, SUITE 1560 SEATTLE, WA 98101	
Ca		/22 Ent. 05/02/12851276392:400 Pg. 4 of 4	